

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

|   |                            |   |
|---|----------------------------|---|
| <b>IN RE:</b><br><br><b>WINGSPAN PORTFOLIO<br/>ADVISORS, LLC,</b><br><br><b>DEBTOR.</b> | §<br>§<br>§<br>§<br>§<br>§ | <b>CASE NO. 15-41255-BTR</b><br><br><b>(Chapter 7)</b><br><br><b>Hearing: 10-25-17 at 1:30 PM</b> |
|---|----------------------------|---|

**TRUSTEE'S WITNESS AND EXHIBIT LIST**

COMES NOW Michelle H. Chow, Chapter 7 Trustee (“Trustee”), and files this, her Witness and Exhibit List in connection with the *Motion to Compromise Controversy and Permit Payments by Insurer (Dkt.1834)*, and would respectfully show the Court as follows:

**WITNESSES**

1. Michelle H. Chow, Chapter 7 Trustee

The Trustee reserves the right to call and/or use testimony offered into evidence by any other party. The Trustee also reserves the right to offer into evidence such additional testimony as may be appropriate for rebuttal and/or impeachment purposes. Finally, the Trustee reserves the right to amend and/or supplement this Witness List to the extent necessary or appropriate.

**EXHIBITS**

| EX. # | DESCRIPTION OF EXHIBIT  | OFFERED | OBJECTED | ADMITTED |
|-------|---|---------|----------|----------|
| 1     | Settlement Agreement  |         |          |          |
| 2     | Demand Letter dated June 29, 2016   |         |          |          |
| 3     | Great American Insurance Group Management and Corporate Liability Protection Insurance Policy |         |          |          |
| 4     | All pleadings and court documents of record in the instant bankruptcy matter.                 |         |          |          |

The Trustee reserves the right to use any documents offered into evidence by any other party. Additionally, the Trustee reserves the right to offer into evidence such additional documents as may be appropriate for rebuttal and/or impeachment purposes. Finally, the Trustee reserves the right to amend and/or supplement this Exhibit List to the extent necessary or appropriate.

**DATED this 20th day of October, 2017.**

Respectfully submitted,

SINGER & LEVICK, P.C.

By: /s/ Michelle E. Shiro  
Michelle E. Shiro  
State Bar No.: 18310900

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ATTORNEYS FOR MICHELLE H. CHOW, TRUSTEE

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District and to the parties listed below via electronic service and/or first class mail, postage pre-paid, on this 20th day of October 2017.

|  |  |
|--|--|
| <b><u>Debtor:</u></b><br>Wingspan Portfolio Advisors LLC<br>18451 Dallas Parkway, Suite 100S<br>Dallas, TX 75287-5206  | <b><u>Debtor's Attorney:</u></b><br>Daniel I. Morenoff<br>The Morenoff Firm, PLLC<br>PO Box 12347<br>Dallas, Texas 75225<br>Email: <a href="mailto:dan.morenoff@morenoff-firm.com">dan.morenoff@morenoff-firm.com</a>                              |
| <b><u>Atty for Melbourne Employees:</u></b><br>Stephen J. Biggie<br>Arcadier and Associates, P.A.<br>2815 W. New Haven Avenue, Suite 304<br>Melbourne, FL 32904<br>Email: <a href="mailto:biggie@melbournelegalteam.com">biggie@melbournelegalteam.com</a> | <b><u>Atty for Former Directors &amp; Officers of Debtor:</u></b><br>Jill R. Carvalho, Ph.D.<br>King & Spalding, LLP<br>401 Congress Avenue, Suite 3200<br>Austin, TX 78701<br>Email: <a href="mailto:jcarvalho@kslaw.com">jcarvalho@kslaw.com</a> |
| <b><u>US Trustee:</u></b><br>Office of the US Trustee<br>110 N. College Ave, Ste 300<br>Tyler, TX 75702-7231   | <b><u>Trustee:</u></b><br>Michelle H. Chow<br>Chapter 7 Bankruptcy Trustee<br>6318 E. Lovers Lane<br>Dallas, TX 75214-2016   |

/s/ Michelle E. Shiro  
Michelle E. Shiro